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Planning Policy Team
Brentwood Borough Council
Town Hall
Brentwood
Essex
CM15 8AY

Our ref: SH006 – 6

14 March 2016

Dear Sir

**BRENTWOOD DRAFT LOCAL PLAN: REGULATION 18 CONSULTATION
FORMER EHS METALS YARD AND 139 – 149 COXTIE GREEN ROAD, COXTIE GREEN**

On behalf of Sunbury Homes, I write with regard to the borough council's draft Local Plan and the current Regulation 18 consultation exercise. My client has an interest in the land at the former EHS Metals Yard and numbers 139 to 149 Coxtie Green Road, Coxtie Green, which was identified as a potential site for residential development in the Strategic Growth Options Consultation (January 2015) under references 171 and 172.

Sites 171 (Former EHS Metal Scrapyard, Coxtie Green Road) and 172 (Land rear of 131 – 137 Coxtie Green Road) comprise a scrapyards, industrial uses and hardstanding within the Metropolitan Green Belt. It has been determined from intrusive investigations that both sites have a degree of contamination and that this has the potential to impact on adjoining land and watercourses. As well as creating an opportunity to comprehensively deal with the historic contaminative uses, redevelopment of the EHS Metals Scrap Yard will remove a use which is incompatible with adjoining residential dwellings.

Draft Policy 5.1: Spatial Strategy and Figure 5.4 set out a sequential test for the allocation of land for development, with brownfield sites in the Green Belt considered as the second tier, to be required only if all suitable and available locations within the built-up area have been brought forward first, and prior to strategic sites (third tier), greenfield sites in the Green Belt (fourth tier) and reliance on windfall sites. The draft Local Plan acknowledges that land supply is constrained and identifies sites as far as the fourth tier in draft Policy 7.4.

Draft Policy 7.4 Housing Land Allocations identifies sites with potential capacity for ten or more homes that should be allocated for residential development between 2013 and 2033. However, the above site has not been included in the list set out in Figure 7.2, even though it meets the requirement for limited release of Green Belt development described in Policy 5.1 and the site selection tests described in paragraph 7.29 and offers a more sustainable form of development than some of the sites that have been selected. For the record and as required by draft Policy 5.1, the site is within a transport corridor, in a strategic location that is already part of a self-sustaining community with accompanying local services, has clear defensible physical boundaries to avoid further sprawl and will provide development swiftly.

The site is close to the northern edge of the existing Brentwood Urban Area and is part of the ribbon of development that extends westwards along Coxtie Green Road from Pilgrims Hatch. The site is not isolated in the countryside and reads as part of the transition between the built-up area of Brentwood and the rural area that surrounds it. The site would therefore be a logical and well-defined extension to the existing development on the north side of the road. The scrapyards are considered to be a nuisance and an un-neighbourly use, meaning that there is no significant harm caused by the land being changed to an alternative use. The designation of the land in agricultural use to the north as part of the Green Belt also means that there is no opportunity for the development of the site to begin a process of expansion into countryside to the north west of Brentwood. The proximity of the site to Pilgrims Hatch and northern Brentwood means that it is close to local services and facilities, including schools, shops and a health centre. Coxtie Green Road is served by a regular bus service (routes 71 and 72) and also has good access to employment areas, Brentwood's town centre, railway station and the M25/A12 junction.

Furthermore, an application for planning permission to comprehensively redevelop the site and create 12 no. new homes (reference 16/00226/FUL) is currently being considered, including proposals to remediate the substantial levels of contamination caused by the previous use and to build a mix of two, three, four and five bedroom houses, including a proportion of affordable housing. The application also confirms (as required by Policy 5.1) that the development of the site will have no significant impact on the Green Belt, visual amenity, heritage, transport and environmental quality (including landscape, wildlife, flood risk, air and water pollution). It is also anticipated that financial contributions towards social infrastructure improvements will also be secured by a legal agreement attached to the planning permission.

The site has already been promoted through the Strategic Housing Land Availability Assessment call for sites process, was identified as a potential site for residential development in the Strategic Growth Options Consultation and is now subject to an application for planning permission, demonstrating that it can be considered to be deliverable in the short term. The footnote to Paragraph 47 of the National Planning Policy Framework states that a site is considered deliverable if it meets the criteria of being (a) available now, (b) offers a suitable location for development now, (c) is achievable with a realistic prospect that housing will be delivered on the site within five years and (d) development of the site is viable. The proposed redevelopment of the site meets these four tests of deliverability.

The applicant has control over the whole site and all uses are currently "on hold" pending the commencement of redevelopment works. As such, it is currently available for development and the remediation of the site and construction of new homes could commence as soon as the necessary permissions are in place. The location of the site is described above, with its proximity to the edge of the built-up area, position on a main road and accessibility to a regular bus service meaning that it can be considered to be a suitable location for development. There is a realistic prospect that housing will be delivered on the site within five years: there are no physical, environmental, social or legal constraints upon the site that could prevent development, although it is accepted that extensive decontamination works will be required. As such, upon the grant of planning permission for redevelopment for residential use, the site can be developed with new homes straight away, making it achievable in the short term. The site is already controlled by a developer and an application for planning permission is currently being considered. Based on detailed financial appraisals undertaken by Sunbury Homes and subject to agreeing appropriate contributions through the negotiation of a Section 106 Agreement, the site is a viable proposition. In short, the site passes the tests of being available, suitable, achievable

and viable and can therefore be considered to be a deliverable housing site. Moreover, the site is deliverable in the short term: it can be developed as soon as the necessary approvals are in place and, as noted above, an application for planning permission is currently being considered, emphasising that the site can be delivered for residential development in the near future.

As such, Sunbury Homes wishes to highlight that the land at the former EHS Metals Yard and 139 to 149 Coxtie Green Road passes the site selection tests set out in the draft Local Plan and that it should be included in the list of sites allocated for residential development that are set out in draft Policy 7.4 and Figure 7.2.

I trust that you will find these notes to be clear and straightforward, but if you have any queries, or should you wish to discuss the redevelopment of the site in greater detail, please do not hesitate to contact me at the above address.

Yours faithfully

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MICHAEL SMITH

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